BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended	)	**WT Docket No. 99-87**
	)	
Promotion of Spectrum Efficient Technologies on Certain Part 90 Frequencies	)	**RM-9322**
	)	
Establishment of Public Safety Radio Pool in the Private Mobile Frequencies Below 800 MHz	)	**RM-9405**
	)	
Petition for Rule Making of the American Mobile Telecommunications Association	)	**RM-9705**

COMMENTS OF SCANA COMMUNICATIONS, INC.

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Dated: April 2, 2001

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REPLY COMMENTS OF SCANA COMMUNICATIONS, INC.

Pursuant to FCC Rule 1.415, 47 C.F.R. § 1.415, SCANA Communications, Inc. (SCI), by and through its undersigned telecommunications counsel, hereby files reply comments in the above referenced proceeding (FNPRM).[1] The FCC has commenced this rulemaking proceeding to determine whether to require Part 90 licensees to migrate to narrowband technology. As detailed more fully below, SCI shares the concerns expressed by many of the commentors over

[1] In the Matter of Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, Promotion of Spectrum Efficient Technologies on Certain Part 90 Frequencies, Establishment of Public Service Radio Pool in the Private Mobile Frequencies Below 800 MHz, Petition for Rule Making of the American Mobile Telecommunications Association, WT Docket No. 99-87, RM-9332, RM 9405, RM-9705, Report and Order and Further Notice of Proposed Rulemaking, (Released November 20, 2000).

the impact of a mandatory transition to narrowband operations in the 800 MHz band. SCI therefore urges the FCC to refrain from taking any steps in this direction.

I. Statement of Interest

SCI provides the SCANA corporate family, the State of South Carolina and various local public safety entities with safe, dependable, and efficient communications, through its non-profit, cost-shared Power/Public Safety 800 MHz land mobile radio system. This system was proposed following the extensive damage caused by Hurricane Hugo in 1989 and is designed to provide seamless and reliable wireless communications to South Carolina Electric & Gas (SCE&G) in support of its utility operations and to public safety agencies. Specifically, the system is designed to facilitate the coordination of public safety responses to natural disasters affecting multiple jurisdictions, such as hurricanes and tornadoes. During natural disasters, public safety agencies need to communicate and coordinate with SCE&G's repair crews. Accordingly, wireless communications are of the utmost importance, particularly given that severe weather can incapacitate wireline communications. SCI has designed the system to meet the increasing communications requirements of all the users and to handle SCE&G's extensive customer service dispatch operations. Currently, the system is shared with over 100 Power or Public Safety licensees and has approximately 7,250 mobile, portable, and control units, and 30 base station sites.

SCI primarily uses its land mobile radio system to enable its work crews to communicate with headquarters and with each other when they are out in the field responding to power outages, gas leaks, service requests, and related troubles. In these circumstances, the ability of SCI's employees to communicate at all times is essential. Crews frequently work with extremely hazardous high voltage wires, high-pressure gas mains, etc. Additionally, service personnel must

respond quickly and efficiently to power outages to ensure continued service to SCI's customers, especially hospitals and other emergency care providers, which employ life support systems and emergency response equipment.

SCI is in the process of building and deploying its 800 MHz system at various sites within its service areas. These areas are critical due to their proximity to the coastal areas of the state, which are most vulnerable to hurricane activity. However, even during routine operation of SCI's facilities, it is essential that personnel in the field be able to engage in instantaneous, uninterrupted communication with each other and with SCI headquarters to insure that work is carried out promptly, safely and efficiently. In times of power outages and hurricane activity, the need for reliable wireless communications between all eligible users is even greater.

The SCI system is an invaluable resource for the public safety community in the State of South Carolina. The system is an extremely cost-effective way for small and medium sized users to access highly reliable wireless communications. Furthermore, by consolidating their use of the radio spectrum under one system, the users are able to obtain a high degree of spectrum-efficiency. SCI's effectiveness in supporting the utility and public safety operations of its users is directly dependent upon the ability to maintain currently licensed spectrum and to access new spectrum in the future.

II. Discussion

In this FNPRM, the FCC has requested comments on whether mandating the migration to narrowband technology for licensees of Part 90 frequencies between 222 MHz and 896 MHz by a certain date will pose unreasonable burdens on licensees and the timetable for implementing any changes. Twelve parties filed comments addressing these issues. As set forth more fully below, SCI believes that forced migration will pose an unreasonable burden on wide area 800

MHz licensees that support critical utility functions with their systems. Narrowband technology is inappropriate in the 800 MHz band because private land mobile radio licensees operating in the 800 MHz band operate efficiently and are subject to different considerations from those operating below 800 MHz. The Commission's determination as to whether to mandate narrowband operations in the 800 MHz band should be distinct from its consideration of such requirements in the bands below 800 MHz.[2] SCI therefore supports those comments that oppose a mandated transition to narrowband operations in the 800 MHz band.[3]

As API points out, there has been no evidence presented in this proceeding "that the 25 kHz bandwidth channels in the 800 MHz band are spectrally inefficient."[4] Most 800 MHz systems are trunked and are far more efficient than the same number of channels operating under regulations governing frequencies below 800 MHz.[5] The 800 MHz band also has "adequate technical flexibility to provide for the use of more efficient technology should the market demand such improvements."[6] Furthermore, "petroleum companies, pipelines, and utilities, rely heavily for both day-to-day and emergency communications upon 800 MHz systems that cannot readily be adapted to narrowband technologies."[7] These companies have spent many years and millions of dollars to implement complex wide area systems in reliance upon 25 kHz channelization. A mandated transition to narrowband operations in the 800 MHz band would cause extraordinary hardship far outweighing any countervailing benefits. Licensees would be

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[2] See Comments of American Petroleum Institute at 4 (March 5, 2001) (API Comments).
[3] See API Comments at 4; Comments of Cinergy Corporation at 7 (March 5, 2001); Comments of Motorola at 6 (March 5, 2001) (Motorola Comments); Comments of The Personal Communications Industry Association, Inc. at 3 (March 5, 2001) (PCIA Comments);
[4] API Comments at 4.
[5] See PCIA Comments at 3.
[6] Comments of Motorola at 6 (March 5, 2001) (Motorola Comments).
[7] API Comments at 4; See Also Cinergy Comments at 7 (Utilities use the 800 MHz band for their most sensitive communications).

required to overhaul their systems, most likely before the useful life of their 25 kHz equipment was complete, at extraordinary expense and with a high potential for disruption and compromise of their system operations.

SCI submits that the FCC has wisely determined not to apply the refarming initiatives to the bands above 800 MHz. As is made clear in the comments filed in this proceeding, operations in these bands are already conducted in a highly efficient manner and are of an extremely sensitive nature. For these reasons, SCI supports the comments of The Personal Communications Industry Association, API, Motorola, and Cinergy stating that mandating narrowband operations is not appropriate in the 800 MHz band.

III. Conclusion

If adopted by the FCC, mandated migration to narrowband channels would cause extraordinary disruption and expense to licensees that have invested in their communication system based upon the existing channelization. Therefore, it is inappropriate to require the implementation of narrowband technology in that band.

WHEREFORE, THE PREMISES CONSIDERED, SCI urges the Commission to consider these Comments and to proceed in a manner consistent with the views expressed herein.

Respectfully submitted,

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Dated: April 2, 2001

CERTIFICATE OF SERVICE

I, Christine Biso, do hereby certify that on this 2nd day of April 2001, a copy of the foregoing "Comments for SCANA Communications, Inc." was mailed, via U.S. Mail, postage pre-paid to each of the following:

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